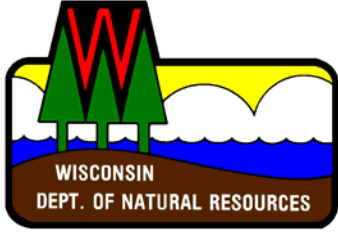




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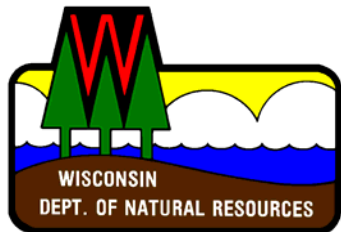
# **Presentation of NR 411 Rule Revision & Draft Direction for Implementation**



# Presentation Outline

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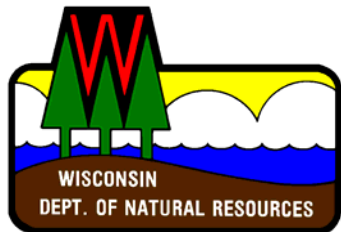
- ◆ Overview of NR 411
- ◆ Objectives for Revision
  - ◆ Streamline Process
  - ◆ Eliminate Carbon Monoxide Criteria
  - ◆ Address Diesel Emissions
  - ◆ Revise Roadway Requirement
- ◆ Questions and Comments
- ◆ Feedback and Timeline



## Questions for Comment

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- ◆ Criteria for Heavy Duty Diesel Truck Hot Spots
- ◆ Travel Demand Management Requirements for Employers in Non –Attainment Areas
- ◆ Criteria for Roadway Projects and Construction Emission Mitigation
- ◆ Data Collection Needs/Reporting Requirements



# Current Indirect Source Rule

## Overview

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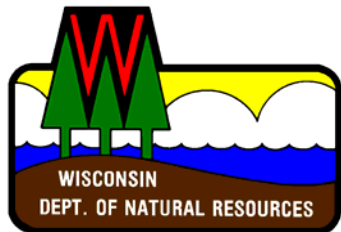
- ◆ State requirement to evaluate impact of large parking lots on nearby intersections for compliance with NAAQS for Carbon Monoxide (CO)
- ◆ Each Indirect Source Permit application also requires Environmental Analysis
- ◆ Screening Level Analysis Requirement for Roadways for Expansion with Peak Period Traffic Criteria.
- ◆ CAL3QHC Modeling and MOBILE 6.2 Emission factors



# Indirect Source Permit Process

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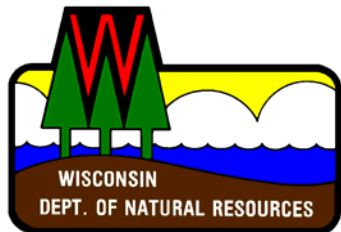
- ◆ Consultation.
- ◆ Coordinated Review with Region
- ◆ Preliminary Determination and Public Comment Period
- ◆ Public Hearing
- ◆ Final Action on Permit
- \* Contested Case



# WDNR's Indirect Source Rule Revision Proposals

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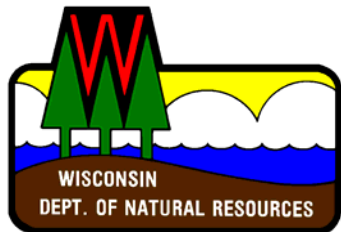
- ◆ WDNR proposes to streamline current IDS permit process to compliment Registration Permit Program – Air Permit Improvement Initiative (APII).
- ◆ WDNR is proposing to eliminate Carbon Monoxide (CO) screening level analysis for Roadway expansion projects
- ◆ WDNR is proposing new off-road control measure requirements for “Non-Exempt” Transportation Projects in Non-Attainment Areas



## WDNR's Indirect Source Rule Revision Proposals (cont.)

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- ◆ WDNR is proposing new standard for new developments statewide that will replace current parking space threshold with number of heavy duty diesel truck trips
- ◆ WDNR is proposing Travel Demand Management Plan requirement for large scale parking expansion in Non-Attainment Areas



# Indirect Source Rule Revision - Rationale

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- ◆ Managing Resources and Streamlining Process
- ◆ CO No Longer a Pollutant of Concern.
- ◆ Focusing on NO<sub>x</sub>, VOC, and PM 2.5
- ◆ Permitting Distribution Centers
- ◆ Contribution from Off-Road Sector
- ◆ Ozone Non Attainment Area and SIP Development
- ◆ New CMAQ Guidance and Transportation Conformity Credit
- ◆ National Trends relating to Heavy Duty Diesel Trucks

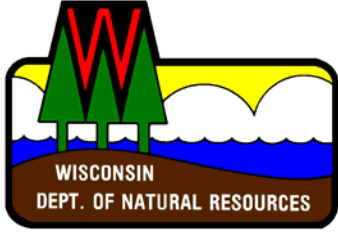




# Indirect Source Rule Revision

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- ◆ Streamline Permit Process – Abbreviated Review, No Modeling Requirements, No Environmental Assessment Requirement, No Permit Fee, Self-Certification
- ◆ Heavy-Duty Diesel Truck Standard for New Development – 50 Trips
- ◆ Heavy-Duty Diesel Truck Control Measures – Low NO<sub>x</sub> Chip Re-flashing and Idle Restriction
- ◆ Heavy Duty Diesel Truck Control Measures – Considerations for Truck Stops and Non-Owned Trucks

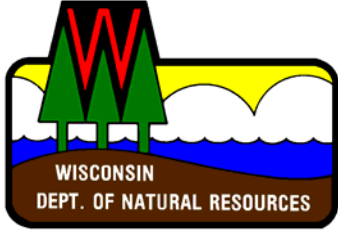


# Indirect Source Rule Revision

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## Technical Support for Heavy Duty Diesel Truck Control Measures:

- ◆ ENVIRON Study on Low-NOx Chip Reflashing. - \$400/Ton
- ◆ Manufacturer's Obligated to Repair at No Cost based on DOJ Consent Decree
- ◆ Current Re-Flash Assumption in MOBILE 6.2
- ◆ EPA's SMARTWAY Initiative, Midwest Diesel Corridor Initiative, and Model Anti-Idling Ordinance, Federal and State Funding Availability

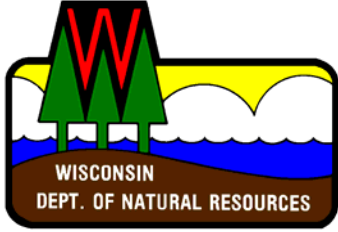


# Indirect Source Rule Revision

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## State Model Idle Law:

- ◆ EPA Facilitated
- ◆ Applicability
- ◆ Load/Unload Restrictions
- ◆ Exemptions
- ◆ Phase In Period/Funding Availability
- ◆ Citation Authority

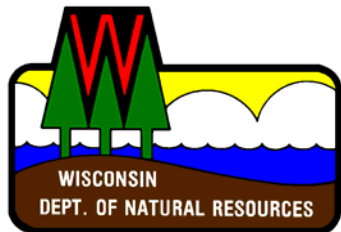


# Indirect Source Rule Revision

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New Control Measure Requirements for Off Road Construction Equipment in Non-Attainment Area:

- ◆ Applies to SEWRPC and BLRPC projects
- ◆ On-Road Diesel Fuel
- ◆ Diesel Oxidation Catalyst
- ◆ Idle Restriction (5 Min)

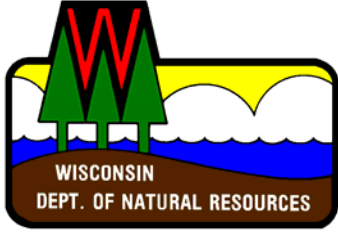


# Indirect Source Rule Revision

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Technical Support for Off-Road Construction Equipment Control Measures:

- ◆ EPA Estimates for On-Road Fuel
- ◆ Fuel Condition Replicated in Several Indirect Source Permits
- ◆ SIP Credits and Transportation Conformity

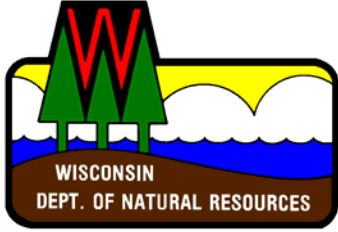


# Indirect Source Rule Revision

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Technical Support for Transportation Demand Management requirement:

- ◆ Travel Demand Management Plans already conducted in several Permits
- ◆ Ensures that Employers have considered alternative modes of transportation before constructing large scale parking lots
- ◆ Consistent with Partners for Clean Air objectives and EPA's Best Commuter Workplace
- ◆ Reference from Washington State Commute Trip Reduction Law

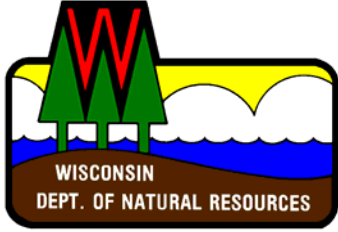


# Indirect Source Rule Revision

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## Technical Support for Off-Road Construction Equipment Control Measures (Cont.):

- ◆ Diesel Oxidation Catalyst is an EPA verified Retrofit Technology
- ◆ Relatively Inexpensive
- ◆ Particulate Matter (PM) and Hydrocarbon Reduction
- ◆ Successfully Implemented in Illinois, Massachusetts, Connecticut, and New York Projects
- ◆ CMAQ Funding Eligibility
- ◆ SIP Credits and Transportation Conformity



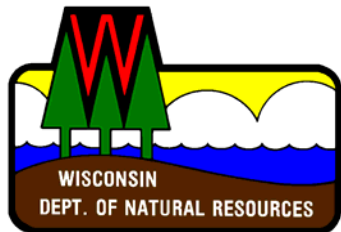
# Indirect Source Rule Revision

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## Transportation Demand Management Plan Specifics:

- ◆ Applies only to Employers in Non-Attainment Area
- ◆ Elimination of “NR 411 Incremental Growth” Provision
- ◆ Identification of Transportation Coordinator
- ◆ Provision for Preferential Parking or Reduced Parking Fee, or both, for High Occupancy Vehicles
- ◆ Instituting or Increasing Parking Charges for Single Occupant Vehicles



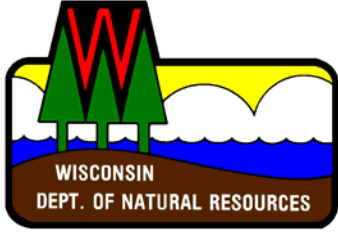


# Indirect Source Rule Revision

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## Transportation Demand Management Plan Specifics

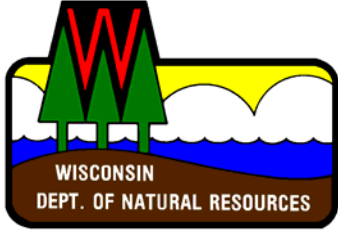
- ◆ Provision of subsidies for Transit Fares
- ◆ Provision of Bicycle Parking Facilities, Lockers, Changing Areas, and Showers for Employees who Bicycle or Walk to Work
- ◆ Provision of a Program to Permit Employees to Work Part-Time or Full-Time at Home
- ◆ Provision of a Program of Parking Incentives such as a rebate for Employees who do not use the Parking Facility



# Indirect Source Rule Revision

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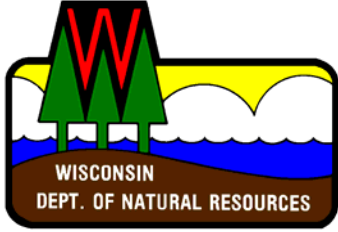
- ◆ Transportation Conformity – New Guidance Allows for Credits from Mobile Sources and Off-Road Control Measures to Be Used in Conformity Analysis
- ◆ Current Safety Margin in Non-Attainment Area
- ◆ Emission Reduction Requirements - Reporting



# Indirect Source Rule Revision

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- ◆ Deadline for 8-Hour Ozone Attainment SIP
- ◆ Status of Proposed PM 2.5 Standard
- ◆ CMAQ Funding Schedule
- ◆ Department of Commerce Idle Reduction Grant



# Indirect Source Rule Revision

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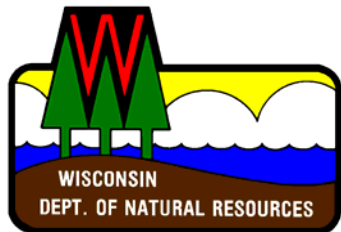
## Proposed Timeline for NR 411

- ◆ 5 June - Initial Stakeholder Session
- ◆ 10 July – Final Green Sheet Package
- ◆ 16 Aug – Natural Resources Board Hearing Authorization
- ◆ October 2006 – Public Hearings
- ◆ March 2007 – Rule Adoption by NR Board



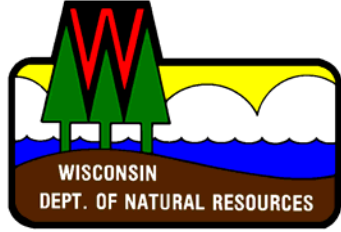
We would like specific feedback on the following issues.

- ◆ Recommendations for Roadway Efficiency Improvements to be Considered in Rule
  - ◆ Signalization
  - ◆ Congestion Management System
- ◆ Proposed Criteria for “Non-Exempt” Projects in Non-Attainment Area
  - ◆ Is there a more effective means to identify projects through MPO and WisDOT?
  - ◆ Is there an effective balance?



We would like specific feedback on the following issues.

- ◆ Control Measure Selection
  - ◆ Diesel Oxidation Catalyst Versus NOx Control
  - ◆ Idle Restrictions Application
  - ◆ Transportation Demand Management Plans – Non Attainment or Metropolitan Area?
  - ◆ Equity – New Versus Existing
- ◆ Outreach Coordination



## Questions?

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For more information on the Indirect Source  
Rule Revision, contact Mike Friedlander at  
[Michael.Friedlander.@dnr.state.wi.us](mailto:Michael.Friedlander.@dnr.state.wi.us)